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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
MEDFORD DIVISION

JANE DOE, by and through her Guardian ad Litem Christina H,	}	Case No. 1:10-cv-03113-CL
JANE DOE 2, by and through her Guardian ad Litem Elaine H, and	}	
JANE DOE 3, by and through her Guardian ad Litem, Jackie F.,	}	
Plaintiffs,)	
v.)	MOTION FOR ORDER DIRECTING COMPLIANCE WITH SUBPOENA DUCE TECUM AND ORDER FOR SANCTIONS [FRCP 37 and 45(c)(2)(B)(I), FRCP 11]
MEDFORD SCHOOL DISTRICT)	
549C, PHIL LONG, SALLIE JOHNSON, and CHRIS GILMAN,)	
Defendants.)	

TO THE MEDFORD POLICE DEPARTMENT AND THEIR ATTORNEYS OF
RECORD:

PLEASE TAKE NOTICE plaintiffs will and hereby do move the court for and order

MOTION FOR ORDER DIRECTING
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DUCE TECUM

directing compliance with the Deposition Subpoena for Production of Business Records (“subpoena”) served by plaintiffs on the Medford Police Department (“Medford PD”) on October 25, 2010, requiring Medford PD to produce the documents and record of Medford PD’s Case No. 10-2052, and for monetary sanctions in the amount of \$2,100.00 for 7 hours of attorney time and travel for the costs of bringing this motion.

This motion is and will be made on the grounds that the records sought are directly relevant to the plaintiffs’ case, essential to a fair resolution of the lawsuit, and the defendant’s objections to the subpoena are not valid in federal court. Moreover, the information sought in the subpoena cannot be obtained by less intrusive means.

This motion is and will be based on this Motion, the Memorandum in Support of Motion, and the Affidavit of Thomas N. Petersen served herewith, all the pleadings, records, and papers on file in this action, and such further oral and documentary evidence as may be presented at the hearing of this motion.

DATED this 5th day of November, 2010.

BLACK, CHAPMAN, WEBBER & STEVENS

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